

KRAUSE & ASSOCIATES, P.C.
Attorneys At Law
45 Broadway – 27th Floor
New York, New York 10006
Tel: 212-269-7000
Fax: 212-269-7514

August 4, 2022

Via ECF only

Honorable Lee G. Dunst
United States Magistrate Judge
Alfonse M. D'Amato Federal Building
United States District Court
100 Federal Plaza, Courtroom 1030
Central Islip, New York 11722

Re: *Siegel v Milstein et al, Docket # 2:21-cv-04032-JS-SIL*

Dear Hon. Judge Dunst:

We represent plaintiff, Elliot Siegel, and respectfully wish to advise your Honor of the status of discovery in this action. On July 19, 2022, the parties appeared for a telephone discovery conference before your Honor, at which time the parties were directed to meet and confer to address all issues of outstanding discovery.

Following this conference, the undersigned emailed counsel for defendants, Mr. Bryce Jones, on July 21, 2022, to inquire if Mr. Jones was available to confer on July 28, 2022. As no response was received from Mr. Jones, the undersigned sent another email to Mr. Jones on July 27, 2022, again inquiring if Mr. Jones was available to meet and confer on July 28, 2022. Mr. Jones responded to this second email advising that he was in the hospital and required several days to respond to plaintiff's email requesting to meet and confer. The undersigned responded to this email with a list of all outstanding discovery, asking Mr. Jones to contact the undersigned when he is able.

On August 1, 2022, the undersigned again emailed Mr. Jones inquiring as to his availability to meet and confer. On August 2, 2022, the undersigned received an email from Mr. Jones' assistant, stating that he was still hospitalized.

Based upon the Court's directives, the parties were ordered to inform the Court by 8/9/2022 whether they propose any modifications to the existing schedule ordered on 4/13/2022 by Magistrate Judge Steven I. Locke. Given Mr. Jones' hospitalization, it does not appear that the

undersigned will be able to submit any proposed modifications to the existing schedule. In addition, the undersigned has a scheduled vacation from August 9, 2022 through August 23, 2022.

Given Mr. Jones' continued hospitalization, we respectfully request an extension of time to submit modifications to the existing schedule for an additional 30 days until September 9, 2022.

Thank you for your time and consideration.

Respectfully,

Bryan Goldstein